

### **REMARKS**

Applicant submits an Excess Claim Fee Payment Letter for one (1) additional excess claim fee.

Claims 52-94 are all the claims presently pending in the application. Claims 23, 29, 30, 32, 33 and 49-50 have been canceled. Claims 52-94 have been added.

Applicant notes that new claims 52-92 correspond substantially to claims 1-2, 4-13 and 23-51 which were presented in the Amendment filed herein on February 26, 2008.

It is noted that the claim amendments are made only for more particularly pointing out the invention, and not for distinguishing the invention over the prior art, narrowing the claims or for any statutory requirements of patentability. Further, Applicant specifically states that no amendment to any claim herein should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

Applicant respectfully submits that there are features of the claimed invention which are not taught or suggested by the prior art. In particular, nowhere does Huffman et al. (US Pat. 5,663,748), Henckel et al. (US Pat. 5,463,725), Fitzpatrick et al. (US Pat. 5,392,387), Ho (US Pat. 6,407,757), or Amro (US Pat. 6,278,443) teach or suggest "*detecting a page holding operation and calculating a number of holding pages in said page holding operation based on a magnitude of a pressure applied to a position on said operation unit which corresponds to at least one of an information access area of said display unit and a tag display area of said display unit*", as recited in claim 52 and similarly recited in claims 54-56, 62-64, 66, 69, 70, 75, 79, 81, 83 and 87-90 (Application at paragraph [0107]-[0111]). This feature may help to allow a user to realize a more realistic page-turning experience.

#### **A. Huffman**

Huffman simply discloses an electronic book in which a user-initiated event selecting a portion of the text is received by the touchscreen and the touchscreen displays the portion of the text in a highlighted form (Huffman at Abstract). A user controls the book by using an advance page portion or a page back portion (Huffman at col. 8, lines 13-44).

That is, nowhere does Huffman teach or suggest detecting a page holding operation and calculating a number of holding pages in said page holding operation. Thus, Huffman certainly does not teach or suggest calculating a number of holding pages in the page holding operation based on a magnitude of a pressure applied to a position on the operation unit which corresponds to at least one of an information access area of the display unit and a tag

display area of the display unit, as in the claimed invention.

Therefore, Huffman certainly does not teach or suggest the features of the claimed invention.

**B. Henckel**

Henckel discloses an interface for making information available to a user. The user turns the page of a displayed book by touching a screen with an object such as his hand or a pointing device and moving the object across the screen (Henckel at Abstract).

Like Huffman, nowhere does Henckel teach or suggest detecting a page holding operation and calculating a number of holding pages in said page holding operation. Thus, Huffman certainly does not teach or suggest calculating a number of holding pages in the page holding operation based on a magnitude of a pressure applied to a position on the operation unit which corresponds to at least one of an information access area of the display unit and a tag display area of the display unit, as in the claimed invention.

Indeed, **the Examiner conceded this point on pages 11 and 12 of the Office Action dated May 14, 2008.**

Therefore, Henckel certainly does not teach or suggest the features of the claimed invention.

**C. Fitzpatrick**

Fitzpatrick discloses a data processing system including an index screen in which a user can designate selectable topics, and page tabs which are displayed for each numbered data page which includes a reference to a designated selected topic (Fitzpatrick at col. 1, line 62-col. 2, line 4).

That is, like Huffman and Henckel, nowhere does Fitzpatrick teach or suggest detecting a page holding operation and calculating a number of holding pages in said page holding operation. Thus, Fitzpatrick certainly does not teach or suggest calculating a number of holding pages in the page holding operation based on a magnitude of a pressure applied to a position on the operation unit which corresponds to at least one of an information access area of the display unit and a tag display area of the display unit, as in the claimed invention.

Therefore, Fitzpatrick certainly does not teach or suggest the features of the claimed invention.

**D. Ho**

Ho discloses a browsing device 100 for browsing through documents. The browsing device includes a slanted surface 120 and a sensor area 121 formed on the slanted surface 120 (Ho at col. 11, line 8 to col. 12, line 56).

Clearly, the device 100 cannot allow a user to have a realistic page-turning experience. Indeed, the device 100 is completely unrelated to the claimed invention which includes calculating a number of holding pages in the page holding operation based on a magnitude of a pressure applied to a position on the operation unit which corresponds to at least one of an information access area of the display unit and a tag display area of the display unit.

Therefore, Ho certainly does not teach or suggest the features of the claimed invention.

**E. Amro**

Amro discloses simply a computer controlled display system in which a large cursor movement can be controlled by a small rolling of a finger on a touch display screen. This differs from the claimed invention of the present application in its feature and object.

That is, like Huffman and Henckel, Fitzpatrick and Ho, nowhere does Amro teach or suggest detecting a page holding operation and calculating a number of holding pages in said page holding operation. Thus, Amro certainly does not teach or suggest calculating a number of holding pages in the page holding operation based on a magnitude of a pressure applied to a position on the operation unit which corresponds to at least one of an information access area of the display unit and a tag display area of the display unit, as in the claimed invention.

Therefore, Amro certainly does not teach or suggest the features of the claimed invention.

Therefore, these alleged references would not have been combined as alleged by the Examiner and even if combined, the alleged combination would not teach or suggest each and every feature of the claimed invention. Therefore, the Examiner is respectfully requested to withdraw this rejection.

**FORMAL MATTERS AND CONCLUSION**

In view of the foregoing, Applicant submits that claims 52-94, all the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview

The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0481.

Respectfully Submitted,

Date: 2/21/09



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